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April 23, 1997

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Mr. Keith Rose
EPA Remedial Project Manager/Project Coordinator
Harbor Island Superfund Site
EPA Region 10, ECL-111
1200 Sixth Avenue
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Environmental Cleanup Office

APR 23 1997

RE: Addendum to the 30 Percent Remedial Design Technical Memorandum
Design Set 1B - Harbor Island S&GOU Superfund Site, Seattle, WA

Dear Keith:

During our April 21st review meeting for Design Set 1B, you provided us with initial feedback on the above referenced document. You requested that additional information be provided to you as an addendum to the 30 percent technical memo. This letter contains those items:

- 1) Additional references/information (see Attachment A) for two of the remedial action performance standards listed in Section 5.2.2; Criteria for Offsite Shipment of Materials, and Decontamination Water Disposal Criteria.
- 2) A revised design schedule (see Attachment B) that includes a two week EPA review period for both the 30 percent and 100 percent design submittals. We have also added a preliminary design review meeting for RETEC and EPA to occur during EPA's review of the 95 percent design submittal, and have also changed the start of the remedial action bid period to coincide with the completion of EPA review of the final design. Actual remedial activities would not start though until the design is approved by EPA. All of these schedule adjustments are intended to further expedite remedial activities.
- 3) Additional surficial soil sampling procedures to further define the extent of asphalt capping required over predefined areas of arsenic-impacted soil at the for the former Lone Star Northwest property. Attachment C contains a brief description of the work to be performed, with references to portions of the *Harbor Island Sampling and Analysis Quality Assurance Project Plan, February 1991*, prepared by Roy F. Weston. The procedures defined in the Weston QAPP relevant to sample collection, handling and testing will be followed.



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Items 1 and 2 are provided for your review as part of the 30 percent Technical Memorandum. Any additional comments or concerns EPA may have with these items or other portions of the memorandum can be provided in your formal written comments.

In an effort to further expedite the schedule, RETEC would appreciate EPA's quick review of Item 3 and Attachment C. Our desire is to complete the proposed soil sampling at the former Lone Star site during the week of April 28.

As we discussed during our recent meeting, we intend to provide responses as necessary to any formal comments EPA may provide on the technical memo, although we will not be revising the document. Any necessary changes and/or design revisions will be included in the subsequent 95 percent submittal. Please call with any questions.

Respectfully Submitted,

REMEDATION TECHNOLOGIES, INC.

A handwritten signature in cursive script, reading "Bryan W. Stone".

Bryan W. Stone, P.E.
Project Manager

cc: M. Valentine - de maximis
A. Lovely - Lovely Consulting Inc.
E. Stetz - Port of Seattle
Shawn Carter Lilley - Lone Star Northwest
G. Hainsworth, J. Hurst - RETEC

Attachment A

Additional Performance Standards

EPA Off-Site Policy Rule

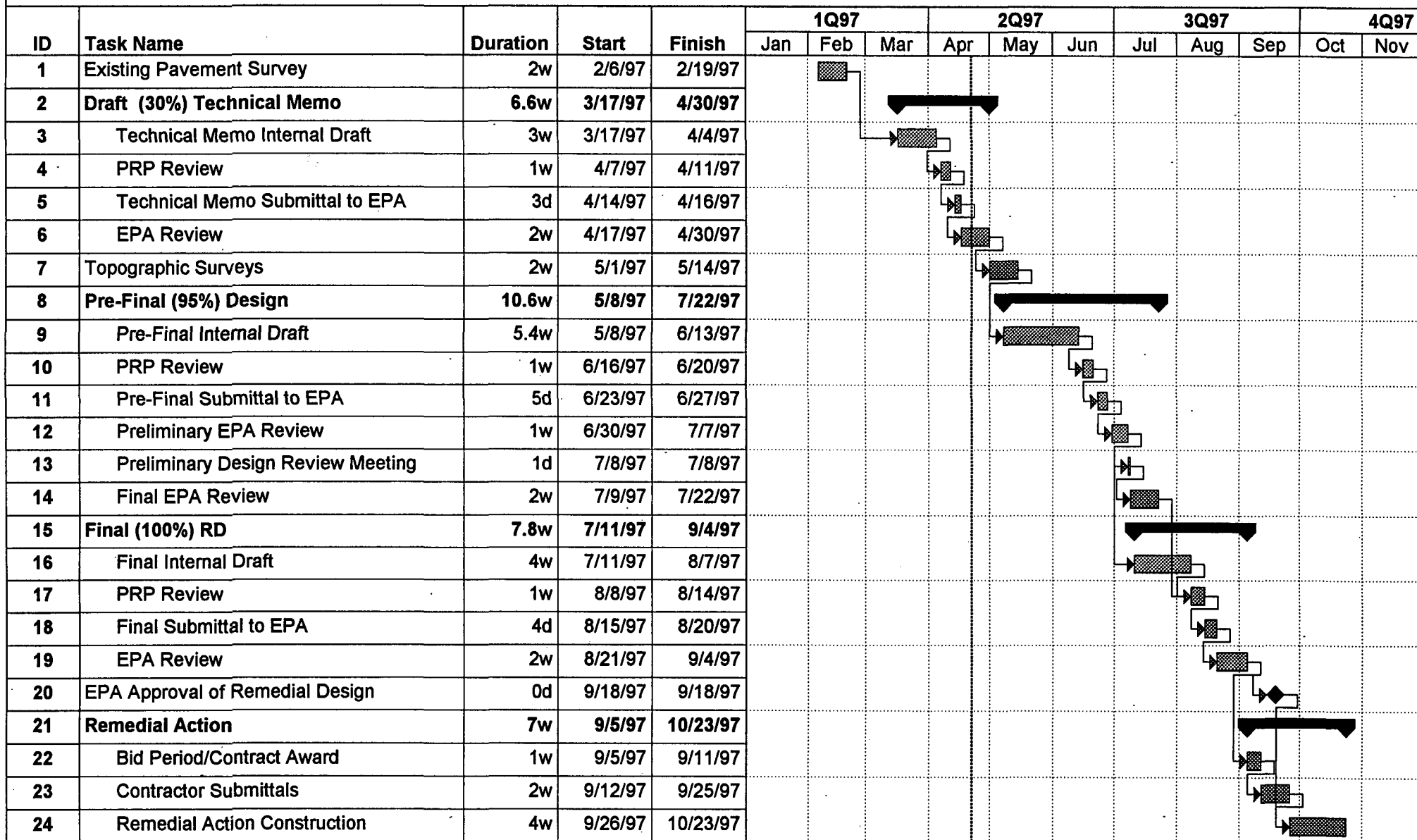
The U.S. EPA has developed the off-site disposal rule to avoid having wastes from CERCLA actions contribute to present or future environmental problems. This is accomplished by directing CERCLA wastes or materials from CERCLA sites to management units determined to be environmentally sound. EPA must make an affirmative determination that a receiving facility is in compliance and releases are controlled before a facility may receive material from a CERCLA site.

Decontamination Water Handling

Decontamination will be required for all equipment and tools that come in contact with native impacted soil. Decontamination water will be collected and containerized in tanks, drums or by other approved means. Decontamination water will be sampled for arsenic, lead, or TPH, based on the constituents of concern for each site. Based on analytical results, the decontamination water will be disposed at a licensed Treatment, Storage, and Disposal (TSD) or other approved facility.

ATTACHMENT B - REVISED FIGURE 3-1 DESIGN SET 1B SCHEDULE HARBOR ISLAND S&G OU

4/22/97



Design schedule is based upon anticipated remedial action schedules that may change due to unforeseen delays related to weather, property acquisition, disruption to commercial activities, or other circumstances.

Task

Progress

Milestone

Summary



Rolled Up Task

Rolled Up Milestone

Rolled Up Progress



Attachment C

Additional Soil Sampling Procedures

1.0 Introduction

Additional surfacial soil (upper 6-inches) characterization will be completed at the former Lone Star Northwest property to further bracket the extent of documented arsenic impacts located along the northern property boundary. Figure 2 is a site map which includes previously collected sample locations from the RI along with two additional proposed sample locations.

2.0 Sample Collection

Proposed sample locations (LS-1 and LS-2) are directly between PS-1 and PS-2. Sample LS-1 is approximately 50 feet southeast and sample LS-2 is approximately 100 feet southeast of the suitable existing concrete surrounding PS-1 (Figure 2).

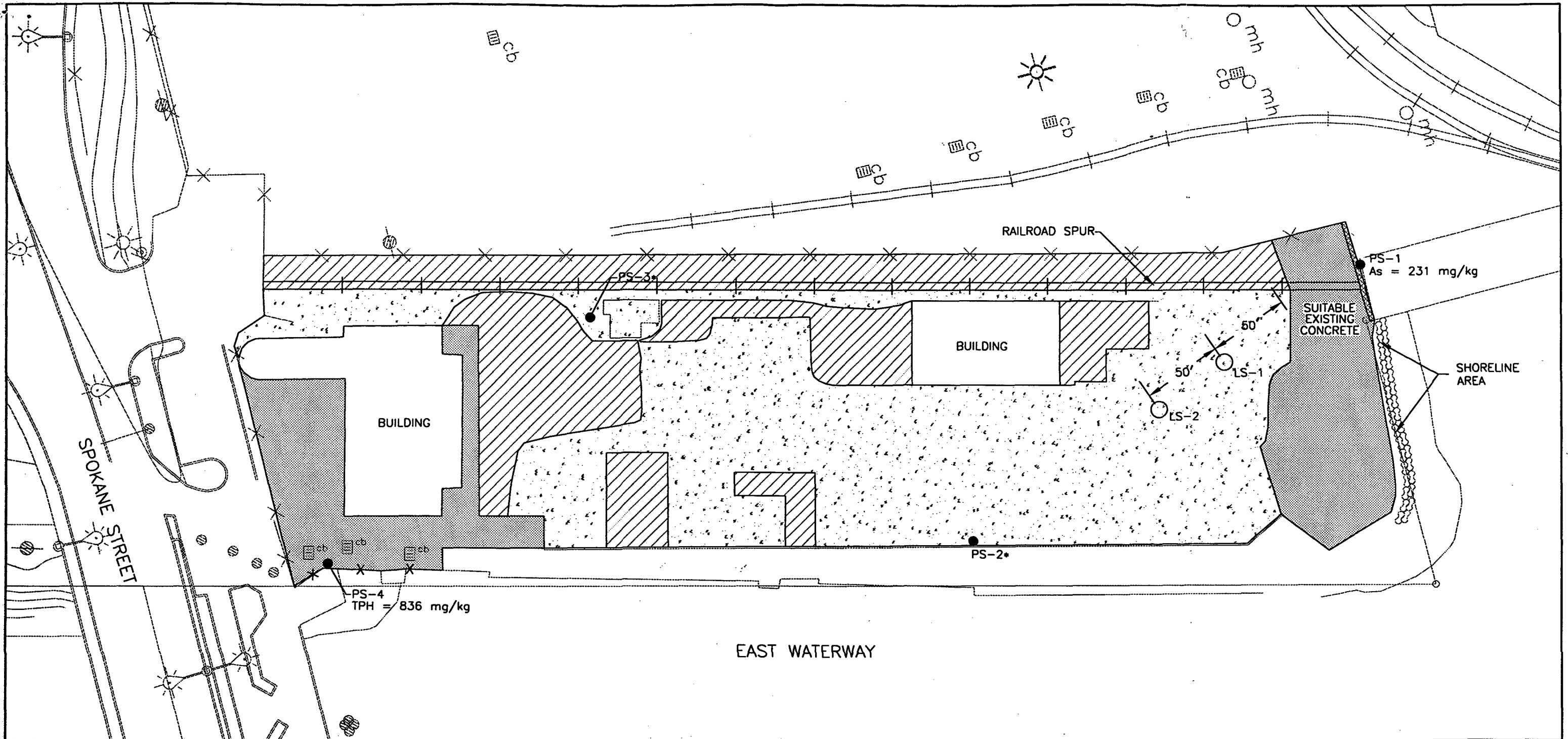
The two proposed samples will be composites collected in accordance with the protocol in Section 6 of the *Harbor Island Sampling and Analysis Quality Assurance Project Plan - EPA Region X, Contract No. 68-W9-0046, Work Assignment No. 46-02-OL21, Document Control No. 4000-02-21-AAHU; Weston, February 1991* (Weston QAPP). Each sample will be collected from five separate locations within a circular area not exceeding 10 feet in diameter. Soil from these five areas will be composited to ensure the sample is representative.

3.0 Sampling Handling, Shipment and Storage

Sample handling, shipment and storage will be accomplished in accordance with protocol in Section 7 of the Weston QAPP. Each sample will be containerized in an appropriate glass jar, suitably labelled, and a chain of custody form will be completed. A sample log form will also be completed that contains information about the sample location (i.e., distance from existing structures, etc.), type of soil sampled, time of day, weather, and any other information that may be pertinent. Both samples will then be sent to Analytical Resources, Inc. (ARI) in Seattle, Washington. Sample LS-1 will be analyzed and sample LS-2 will be archived (refrigerated) pending LS-1 analytical results.

4.0 Analytical Testing Procedures

Sample LS-1 will be analyzed, with a rush turnaround, for arsenic by EPA-CLP (Method 6010) as described in Section 9 of the Weston QAPP. If analytical results for this sample indicate arsenic concentrations exceed 188 mg/kg, sample LS-2 will also be analyzed for the presence of arsenic.



* CONSTITUENT CONCENTRATIONS IN SAMPLE WERE BELOW EPA CAPPING CRITERIA.

LEGEND

- | | | | |
|--|--|--|---------------------------------|
| | SOIL STRIP TO BE CAPPED WITH 3" ACP. MATCH GRADE OF EXISTING ADJACENT PAVEMENT | | APPROXIMATE RI SAMPLE LOCATIONS |
| | SUITABLE EXISTING PAVEMENT | | PROPOSED SAMPLE LOCATION |
| | GRAVEL WITH NO VISIBLE CAP | | FENCE |
| | EXISTING CONCRETE (NO SUITABILITY CRITERIA APPLIED) | | CATCH BASIN |
| | | | UTILITY POLE |
| | | | EXISTING LIGHTPOLE |

HARBOR ISLAND S&GOU
SUPERFUND SITE, SEATTLE, WA
1-2900-240

PROPOSED NEW SAMPLING LOCATIONS
FORMER LONE STAR NORTHWEST

RETEC
REMEDIATION
TECHNOLOGIES INC.
DRAWING NO. 24995135
FIGURE 2 10

REFERENCE DWG	DESCRIPTION	NO	DRWN	DATE	REVISION	CHKD	DATE	APPVD	DATE
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This drawing is sent to you subject to return upon demand, with the understanding that it is not to be reproduced, copied or used, directly or indirectly, in any way detrimental to our interests. All rights reserved.
CURRENT DATE: 4/16/97
CAD FILE: 24995135